

ATTACHMENT G – NOTICE OF INTENT

RECEIVED

WATER QUALITY ORDER NO. 2011-XXXX-DWQ
GENERAL PERMIT NO. CAG XXXXXX

MAR 03 2011

DIVISION OF WATER QUALITY

STATEWIDE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT
FOR RESIDUAL PESTICIDE DISCHARGES TO WATERS OF THE UNITED STATES
FROM VECTOR CONTROL APPLICATIONS

I. NOTICE OF INTENT STATUS (see Instructions)

Mark only one item ☒ A. New Applicator ☐ B. Change of Information: WDID# _____
☐ C. Change of ownership or responsibility: WDID# _____

II. DISCHARGER INFORMATION

A. Name <i>Alameda County Mosquito Abatement District</i>			
B. Mailing Address <i>23187 Connecticut Street</i>			
C. City <i>Hayward</i>	D. County <i>Alameda</i>	E. State <i>CA</i>	F. Zip Code <i>94545</i>
G. Contact Person <i>John R. Rusmisl</i>	H. Email address <i>acmad@mosquitoes.org</i>	I. Title <i>District Manager</i>	J. Phone <i>(510) 783-7744</i>

III. BILLING ADDRESS (Enter Information only if different from Section II above)

A. Name			
B. Mailing Address			
C. City	D. County	E. State	F. Zip Code
G. Email address	H. Title	I. Phone	

IV. RECEIVING WATER INFORMATION

A. Pesticide residues discharge to (check all that apply)*:

1. Canals, ditches, or other constructed conveyance facilities owned and controlled by Discharger.

☐ Name of the conveyance system: _____

2. Canals, ditches, or other constructed conveyance facilities owned and controlled by an entity other than the Discharger.

☒ Owner's name: Varies, but includes Alameda County & 14 cities within County
Name of the conveyance system: All constructed water conveyance facilities in Alameda County

3. Directly to river, lake, creek, stream, bay, ocean, etc.

☒ Name of water body: All waterways in Alameda County

* A map showing the affected areas for items 1 to 3 above may be included. See PAP for MAP

B. Regional Water Quality Control Board(s) where application areas are located

(REGION 1, 2, 3, 4, 5, 6, 7, 8, or 9): Region 2 & 5

(List all regions where pesticide application is proposed.)

V. PESTICIDE APPLICATION INFORMATION

A. Target Organisms: ☒ Vector Larvae ☒ Adult Vector

B. Pesticides Used: List Name and Active ingredients

See PAP & Annual Notice Attached

C. Period of Application: Start Date January 1, 2011 End Date December 31, 2011

D. Types of Adjuvants Added by the Discharger:

VI. PESTICIDES APPLICATION PLAN

A. Has a Pesticides Application Plan been prepared?*

☒ Yes ☐ No

If not, when will it be prepared? _____

* A copy of the PAP shall be included with the NOI.

B. Is the applicator familiar with its contents?

☒ Yes ☐ No

VII. NOTIFICATION

Have potentially affected governmental agencies been notified?

☒ Yes ☐ No Simultaneous with this NOI

* If yes, a copy of the notifications shall be attached to the NOI.

TENTATIVE ORDER

VIII. FEE

Have you included payment of the filing fee (for first-time enrollees only) with this submittal?

☐ Yes

☒ NO

☐ NA

*we have received conflicting answers on the
amount of fee - please send invoice.*

IX. CERTIFICATION

"I certify under penalty of law that this document and all attachments were prepared under my direction and supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment. Additionally, I certify that the provisions of the General Permit, including developing and implementing a monitoring program, will be complied with."

A. Printed Name: John R. Rasmisel

B. Signature: John R. Rasmisel

Date: March 3, 2011

C. Title: District Manager

X. FOR STATE WATER BOARD USE ONLY

WDID:	Date NOI Received:	Date NOI Processed:
Case Handler's Initial:	Fee Amount Received: \$	Check #:

INTENTATIVE ORDER

Alameda County Mosquito Abatement District

BOARD OF TRUSTEES

Marisel Brown, President
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Jim Proia, Secretary
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John R. Rusmisl
District Manager
acmad@mosquitoes.org

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MAR 03 2011

DIVISION OF WATER QUALITY

March 3, 2011

Annual Statement of Intent to apply pesticides

On March 1, 2011 the State Water Board adopted a new Statewide National Pollutant Discharge Elimination System Permit for Residual Pesticide Discharges to Waters of the United States from Vector Control Applications.

The permit requires the District to provide an annual notice of our intent to discharge pesticides to potentially affected governmental agencies. Since the Alameda County Mosquito Abatement District may potentially treat anywhere within the boundary of Alameda County on any given day during the year we are notifying the County and all cities within Alameda County as well as Special Districts such as Park and Sanitary Districts.

ACMAD typically uses larvicides for the purpose of reducing mosquito populations. The larvicides can be broken down into several groups, bacterial products, insect growth regulators and larviciding oil. Several times a year it is necessary for the district to use adulticides to control an outbreak of mosquitoes. These pesticides are synthetic pyrethroids.

Sources treated with the pesticides used by the District require no additional restrictions or precautions to be taken by your employees or the public.

A complete list of all pesticides used by the District along with the EPA registration numbers are listed on the back of this page.

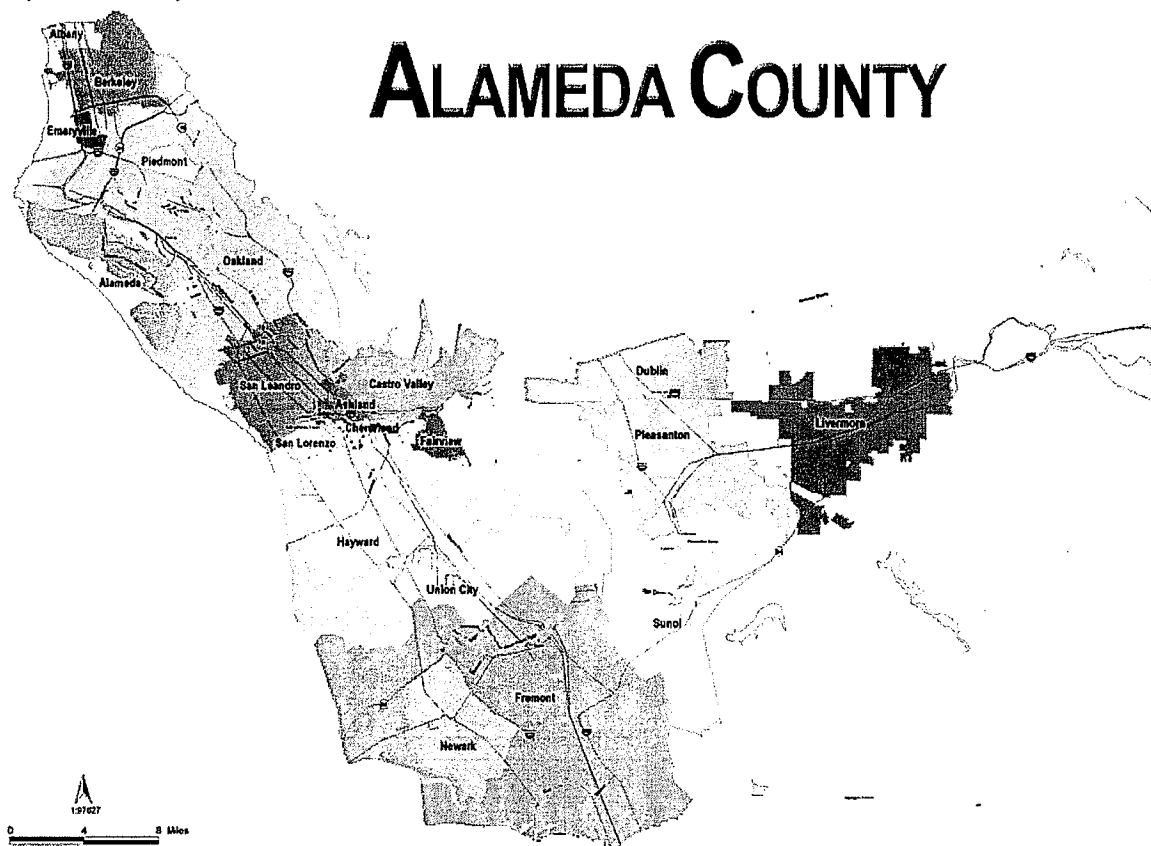
Any questions regarding this statement can be directed to District Manager, John R. Rusmisl at (510) 783-7744 or via email at acmad@mosquitoes.org.

Pesticide Name	Common Name	EPA #
Vectorex CG Biologic	Bacillus sphaericus 7.5% granule	275-77
Vectobac 12AS	Bacillus thuringiensis israelensis 1.2% Liquid	275-66
Vectobac G	Bacillus thuringiensis israelensis 0.2% granule	275-50
Vectorex WSP	Bacillus sphaericus 7.5% granule in water soluble packets	73049-20
VectoMAX CG	Bacillus thuringiensis israelensis 4.5% granules	73049-429
Vectorex WDG	Bacillus sphaericus 51.2% water dispersable granule	73049-57
FourStar 150 Bti	Bacillus thuringiensis israelensis 7% 150 day briquet	69504-2
FourStar 45 Bti	Bacillus thuringiensis israelensis 7% 45 day briquet	69504-2
FourStar 180 Bs	Bacillus sphaericus 6% Bti 1% 180 day briquet	83362-3
Agnique MMF	water soluble surface film	2302-14
Altosid Briquets	methoprene 7.9% 30 day	2724-375-64833
Altosid XR Briquets	methoprene 2.1% 150 day	2724-421-64833
Altosid Liquid conc	methoprene 20% liquid conc	2724-446-64833
Altosid Pellets	methoprene 4% pellet 30 days	2724-448-50809
Altosid XR-G	methoprene 1.5% granule 21 days	2724-451
Altosid WSP	methoprene 4.25% granule in water soluble packs 30 days	2724-448
Altosid SBG	methoprene 0.2% granule 5-10 days	2724-489
Natular XRT	Spinosad 6.25% tablets 180 days	8329-82
Natular G30	Spinosad 2.5% granules 30 days	8329-83
Golden Bear Oil	Aliphatic Petroleum	
Bva 2	Hydrocarbons	8898-16
Scourge 4%	Refined Petroleum distillate 4.14% Resmethrin 12.42%	70589-1
Scourge 18%	Piperonyl Butoxide 18% Resmethrin 54%	432-716
	Piperonyl Butoxide	432-667

Alameda County Mosquito Abatement District – Pesticide Application Plan (PAP) March 2011

- a. Description of the target area and adjacent areas, if different from the water body of the target area;

All aquatic sources in Alameda County are potential targets for pesticide applications if there are mosquito larvae present.



- b. Discussion of the factors influencing the decision to select pesticide applications for mosquito control;

Please see the Best Management Practices for Mosquito Control in California

- c. Type(s) of pesticides used, the method in which they are applied, and if applicable, the adjuvants and surfactants used;

Please see the Best Management Practices for Mosquito Control in California

- d. Description of the types and locations of the anticipated application area* and the target area to be treated by the Discharger, recognizing that, with vector control, the precise locations may not be known until after surveillance;

Any site that holds water for more than 96 hours (4 days) can produce mosquitoes. Source reduction is the District's preferred solution, and whenever possible the District works with property owners to effect long-term solutions to reduce or eliminate the need for

continued applications as described in Best Management Practices for Mosquito Control in California. The typical sources treated by this District include:

Agricultural	Natural	Domestic	Commercial
Stock Ponds	Creeks	Fish ponds	Catch basin
Duck Ponds	Creek potholes	Septic tanks	Storm drain
Agricultural drains	Marsh, tidal	Wells	Gravel pit
Watering troughs	Marsh, reclaimed	Swimming pools	Ditch
	Marsh, fresh	Spa	Sewer pond
	Lakes	Bird baths	Utility vaults
	Ponds	Flooded basement	Cemetery urns
	Tree holes	Containers	Sumps
	Rain pools	Overwatering	Sewer lines
	Seepage		Canal
			Used tires
			Broken pipes

e. Other control methods used (alternatives) and their limitations;

With any mosquito or other vector source, the District's first goal is to look for ways to eliminate the source, or, if that is not possible, for ways to reduce the vector potential. The most commonly used methods and their limitations are included in the Best Management Practices for Mosquito Control in California.

Specific methods used by the District include stocking mosquito fish (*Gambusia affinis*), educating residents that mosquitoes develop in standing water and encouraging them to remove sources of standing water on their property, and working with property owners to find long-term water management strategies that meet their needs while minimizing the need for public health pesticide applications.

f. Approximately how much product is anticipated to be used and how this amount was determined

Treatments applied in Alameda County 2010

Material	Amount	Area treated	Applic Rate	No. of Applic.
Agnique MMF	20 oz	3089.0 sq ft	284.7 fl oz/acre	22
Altosid Briquets	652 oz	2.2 acre	299.0 oz/acre	146
Altosid Liquid conc.	825 oz	824.6 acre	1.0 fl oz/acre	151
Altosid Pellets	3803 oz	113.3 acre	33.6 oz/acre	87
Altosid WSP	22 oz	2.0 acre	11.1 oz/acre	6
Altosid XR briquets	4358 oz	5.8 acre	571.4 oz/acre	429
Altosid XR-G	432 oz	11.0 acre	39.3 oz/acre	1
BVA 2 Oil	47 gal	15.7 acre	3.0 gal/acre	14
Golden Bear Oil	1898 gal	530.4 acre	3.6 gal/acre	751
Natular XRT	16 lb	0.2 acre	92.4 lb/acre	9
Scourge 4%	11 oz	13.5 acre	0.8 fl oz/acre	2
Vectobac 12AS	122 gal	1237.3 acre	0.1 gal/acre	362
Vectobac G	5500 lb	609.8 acre	9.0 lb/acre	597
Vectolex CG	2994 lb	283.3 acre	10.6 lb/acre	706
Vectolex WDG	251 lb	631.2 acre	0.4 lb/acre	347
Vectolex WSP	81 lb	133.1 acre	0.6 lb/acre	467
VectoMax CG	271 lb	22.6 acre	12.0 lb/acre	41

g. Representative monitoring locations* and the justification for selecting these monitoring locations

Please see the MVCAC NPDES Coalition Monitoring Plan

h. Evaluation of available BMPs to determine if there are feasible alternatives to the selected pesticide application project that could reduce potential water quality impacts; and

Please see the Best Management Practices for Mosquito Control in California

i. Description of the BMPs to be implemented

Please see the Best Management Practices for Mosquito Control in California

2. The Discharger shall update the PAP periodically and submit the revised PAP to the State Water Board for approval if there are any changes to the original PAP.

D. Best Management Practices (BMPs)

The Discharger shall develop BMPs that contain the following elements:

The District's BMPs are described in the Best Management Practices for Mosquito Control in California and the California Mosquito-borne Virus Surveillance and Response Plan.

1. Identify the Problem

Prior to first pesticide application covered under this General Permit that will result in a discharge of residual pesticides to waters of the US, and at least once each calendar year thereafter prior to the first pesticide application for that calendar year, the Discharger must do the following for each vector management area:

- a. Establish densities for larval and adult vector populations to serve as action threshold(s) for implementing pest management strategies

Only those mosquito sources that District staff determine to represent imminent threats to public health or quality of life are treated. The presence of any mosquito may necessitate treatment, however higher thresholds may be applied depending on the District's resources, disease activity, or local needs. Treatment thresholds are based on a combination of one or more of the following criteria:

- Mosquito species present
- Mosquito stage of development
- Pest, nuisance, or disease potential
- Disease activity
- Mosquito abundance
- Flight range
- Proximity to populated areas
- Size of source
- Presence/absence of natural enemies or predators
- Presence of sensitive/endangered species or habitats.

b. Identify target vector species to develop species-specific pest management strategies based on developmental and behavioral considerations for each species;

Please see the Best Management Practices for Mosquito Control in California and the California Mosquito-borne Virus Surveillance and Response Plan.

c. Identify known breeding areas for source reduction, larval control program, and habitat management; and

Any site that holds water for more than 96 hours (4 days) can produce mosquitoes. Source reduction is the District's preferred solution, and whenever possible the District works with property owners to implement long-term solutions to reduce or eliminate the need for continued applications as described in Best Management Practices for Mosquito Control in California.

d. Analyze existing surveillance data to identify new or unidentified sources of vector problems as well as areas that have recurring vector problems.

This is included in the Best Management Practices for Mosquito Control in California and the California Mosquito-borne Virus Surveillance and Response Plan that the Districts uses. The District continually collects adult and larval mosquito surveillance data, dead bird reports, and sentinel chicken test results and uses them to guide mosquito control activities.

2. Examine the Possibility of Alternatives to Treatments

Dischargers should continue to examine the possibility of alternatives to reduce the need for applying larvicides that contain temephos and for spraying adulticides. Such methods include:

a. Evaluating management and treatment options that may impact water quality, non-target organisms, vector resistance, feasibility, and cost effectiveness, such as:

- No action
- Source prevention
- Mechanical or physical source reduction methods
- Cultural methods
- Biological control agents
- Pesticides

b. Applying pesticides only when vectors are present at a level that will constitute a nuisance or threat to public health

c. Using the least intrusive method of pesticide application.

d. Public education efforts to reduce potential vector breeding habitat.

e. Applying a decision matrix concept to the choice of the most appropriate formulation.

This describes the District's existing integrated vector management (IVM) program, as well as the practices described in the California Mosquito-borne Virus Surveillance and Response Plan and Best Management Practices for Mosquito Control in California that are used by this agency.

3. Correct Use of Pesticides

Users of pesticides must ensure that all reasonable precautions are taken to minimize the impacts caused by pesticide applications. Reasonable precautions include using the proper spraying techniques and equipment, taking account of weather conditions and the need to protect the environment.

a. All errors in application and spills are reported to the proper authority.

b. Staff training in the proper application of pesticides and handling of spills.

This is an existing practice of the District, and is required to comply with the Department of Pesticide Regulation's (DPR) requirements and the terms of our California Department of Public Health (CDPH) Cooperative Agreement. All pesticide applicators receive annual safety and spill training in addition to their regular continuing education.

E. Pesticide Application Log

The Discharger shall maintain a log for each pesticide application. The application log shall contain, at a minimum, the following information, when practical, for larvicide or adulticide applications:

1. Date of application;
2. Location of the application and target areas (e.g., address, crossroads, or map coordinates);
3. Name of applicator;
4. The names of the water bodies treated if known/ named(i.e., canal, creek, lake, etc.);
5. Application details, such as when the application started and stopped, pesticide application rate and concentration, water flow rate of the target area, surface water area, volume of water treated, pesticide(s) and adjuvants used by the Discharger, and volume or mass of each component discharged;

This is an existing practice of the District as required to comply with DPR regulations and our CDPH Cooperative Agreement requirements.

References:

Best Management Practices for Mosquito Control in California. 2010. Available by download from the California Department of Public Health—Vector-Borne Disease Section at <http://www.cdph.ca.gov/HealthInfo/discond/Pages/MosquitoBorneDiseases.aspx> or <http://www.westnile.ca.gov/resources.php> under the heading Mosquito Control and Repellent Information. Copies may be also requested by calling the California Department of Public Health—Vector-Borne Disease Section at (916) 552-9730 or the Alameda County Mosquito Abatement District at (510) 783-7744.

California Mosquito-borne Virus Surveillance and Response Plan. 2010. [Note: this document is updated annually by CDPH]. . Available by download from the California Department of Public Health—Vector-Borne Disease Section at <http://www.cdph.ca.gov/HealthInfo/discond/Pages/MosquitoBorneDiseases.aspx> or <http://www.westnile.ca.gov/resources.php> under the heading Response Plans and Guidelines. Copies may be also requested by calling the California Department of Public Health—Vector-Borne Disease Section at (916) 552-9730 or the Alameda County Mosquito Abatement District at (510) 783-7744.

MVCAC NPDES Coalition Monitoring Plan. 2011. This plan is in development and the MVCAC will be forwarding to the State Water Board soon.